STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Bell Telephone Company	)	
	)	
Application for Review of Alternative Regulation Plan	))	Docket No. 98-0252
Illinois Bell Telephone Company	)	
	)	
Petition to Rebalance Illinois Bell Telephone Company's Carrier Access and Network Access Line Rates	)))	Docket No. 98-0335
Citizens Utility Board, People of the State of Illinois	))	Docket No. 00-0764
v.	)	
	)	(Consol.)
Illinois Bell Telephone Company	)	

INITIAL BRIEF OF AMERITECH ILLINOIS ON IMPACT OF NEW LEGISLATION

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INITIAL BRIEF OF AMERITECH ILLINOIS ON IMPACT OF NEW LEGISLATION

Illinois Bell Telephone Company ("Ameritech Illinois" or "the Company"), by its attorneys, hereby files its Initial Brief on the impact of amendments to the Illinois Public Utilities Act which became effective on June 30, 2001, on the captioned consolidated proceeding.

INTRODUCTION

As the Commission is well aware, significant amendments to the Illinois Public Utilities Act recently went into effect (H.B. 2900). These legislative changes impact all telecommunications carriers in Illinois to at least some extent. However, Ameritech Illinois is the most significantly affected, because certain provisions apply only to telecommunications carriers operating under an alternative plan of regulation -- i.e., Ameritech Illinois -- or carriers providing both competitive and noncompetitive services -- i.e., ILECs. These new statutory requirements address both the Company's retail and wholesale operations.

Although the long run impact of this legislation may be sweeping, Ameritech Illinois believes that only modest adjustments to the Alternative Regulation Plan and the Hearing Examiners' Proposed Order in this review proceeding are required to reflect the changed regulatory and legal requirements. The principle component of the Plan which should be modified in response to the legislation involves the customer-specific remedies for failure to meet installation and repair standards which were recommended in the Proposed Order. These remedies should be conformed to the provisions of new Section 13-712 of the Act, which specifies customer credits at legislatively mandated levels. The second impact of the legislation involves the structure of the baskets. With the classification of all business services as competitive under new Section 13-502.5 of the Act, all remaining noncompetitive services should be consolidated in one basket to facilitate administration of the Plan. Finally, although not impacting the Plan per se, the legislative mandate for new, flat-rated residential service packages in Section 13-518 has caused Ameritech Illinois to withdraw its rate rebalancing proposal at this time.[1]

I. SERVICE QUALITY PROVISIONS

New Section 13-712 of the Act fundamentally changes the background against which service quality is regulated as a component of the Alternative Regulation Plan. When the

[1] Ameritech Illinois' discussion of the impact of the new legislation is limited to those issues addressed in the Hearing Examiners' Proposed Order.

Commission issued its 1994 Order, the Public Utilities Act did not include detailed or specific mechanisms for regulating the quality of telecommunications services. As a result, the Commission sought to maintain service quality under the Plan by adopting the measures, benchmarks and penalties included in the existing Plan. The Commission adopted that approach working essentially from a blank slate, with no other statutory provisions to consider.

Under Section 13-712, the Commission now is not only permitted, but in fact required, to enforce basic service quality standards on all carriers. The new law provides a detailed description of the primary measures of service quality and an equally detailed description of the penalties to be applied when those measures are not attained. Most importantly, Section 13-712 requires automatic compensation for all customers affected by installation delays, repair delays or missed appointments. The Commission may also impose additional penalties on carriers that fail to provide adequate service. Those provisions apply equally to all carriers, without regard to whether they are subject to rate-of-return regulation, alternative regulation, or neither. 220 ILCS 5/13-712(e).

As a result, the service quality provisions of the Alternative Regulation Plan must now be harmonized with those of Section 13-712. The Commission must re-evaluate the Plan in light of the new law, to carry out the policy decisions that motivated the new legislation and to assure that the structure of the Plan is consistent with those policy decisions.

A. CUSTOMER-SPECIFIC CREDITS SHOULD BE IDENTICAL TO THOSE REQUIRED BY H.B. 2900, AS IMPLEMENTED BY THE COMMISSION'S RULES.

The Proposed Order adopted customer-specific remedies similar to those initially proposed by Ameritech Illinois. Those remedies were based largely on the remedy plans Ameritech Illinois has made available in other states. (HEPO, Section VII, F, Commission

Analysis and Conclusion). The remedies set forth in the Proposed Order were reasonable and appropriate, based on the record as it existed when the Proposed Order was issued. However, since then, the Commission has issued emergency rules implementing the provisions of new Section 13-712 of the Act. The remedies available to consumers under those rules are generally more generous, from a consumer's perspective, than the remedies provided in the Proposed Order. Order in Docket 01-0425, adopted July 10, 2001, App. A.

Ameritech Illinois is currently implementing the provisions requirements of Section 13-712, as implemented by the Commission's emergency rules, as quickly as possible. It will have fully implemented those provisions well before the Commission issues an order in this proceeding. Therefore, the Commission should adopt the service quality provisions of the emergency rule in its order in this proceeding. To the extent, if any, that those provisions change when the Commission adopts a permanent rule, those changes should also be incorporated into the Plan.

The Commission should not, however, adopt any customer-specific remedies in the context of the Plan that would be different from, or in addition to, those adopted pursuant to Section 13-712.

The customer-specific remedies proposed by Staff in its exceptions raised significant concerns in that regard. (See Staff Br. on Exc., pp. 16-17). That proposal varies significantly from the remedy structure in Section 13-712. As a result, different system programming, methods and procedures, and employee training would be required to implement those remedies than would be required to implement the remedies in Section 13-712. By the time an order is issued in this docket, Ameritech Illinois will have spent an enormous amount of time, money and resources implementing the Commission's emergency rules under Section 13-712. Much of that effort might well be wasted if the Commission then changes Ameritech Illinois' obligations as a part of the Plan. Moreover, Staff's proposal might result in either higher or lower remedies for any particular customer, creating opportunities for customer confusion and dissatisfaction. The proposal in GCI/City's exceptions suffers from similar problems. These problems may be eliminated by the filings of Staff and GCI/City regarding the impact of the new law. If they are not, however, the Commission should reject any proposals that vary from the provisions of Section 13-712.

The Commission's statutory goal in addressing service quality under the Plan is to "maintain" service quality at adequate levels for all customers, not to compensate any particular customers. 220 ILCS 5/13-506.1(b)(6). That goal has been addressed in the existing Plan, and should continue to be addressed, primarily through annual benchmarks and penalties. New Section 13-712, on the other hand, was explicitly intended to provide for customer compensation for individual service quality breaches. Therefore, Section 13-712 should determine the structure of the customer-specific remedies to be applied under the Plan.

B. SECTION 13-712 AFFIRMS THE PROPOSED ORDER'S CONCLUSION THAT DOUBLE PENALTIES SHOULD BE AVOIDED.

The Proposed Order properly seeks to avoid the double penalties that could result from adopting a combination of customer-specific remedies and generalized credits. To minimize the likelihood of double penalties, the Proposed Order allows Ameritech Illinois to deduct customer-specific penalties (and associated administrative expense) from any annual penalties it might pay. (HEPO, Section VII, F, Commission Analysis and Conclusion, par. 17.)

Section 13-712 is entirely consistent with the Proposed Order in that regard. Section 13-712 does not address alternative regulation. However, in its treatment of fines, Section 13-712 affirms the Proposed Order's goal of avoiding double penalties. Subsection 13-712(c) provides, "In imposing fines, the Commission shall take into account compensation or credits paid by the telecommunications carrier to its customers pursuant to this Section in compensation for the violation found pursuant to this Section." 220 ILCS 5/13-712(c). The same approach should apply here.

In addition, for the same reasons, the Commission should take into account any customer compensation or annual penalties paid pursuant to the Alternative Regulation Plan in any proceedings considering fines or civil penalties pursuant to Section 13-712. Therefore, consistent with that provision, the Commission's Analysis and Conclusion regarding service quality incentives should be modified to state that the Commission will also consider any customer compensation or annual penalties paid pursuant to the Alternative Regulation Plan in determining any fines or civil penalties pursuant to Section 13-712 of the Public Utilities Act, as amended.

C. All Service Quality Measures In The Plan Should Be Defined Consistently With Those In Section 13-712 And The Commission's Rules.

The Proposed Order correctly determined that the definition of the measure for Out of Service Over 24 Hours ("OOS>24") should be conformed to the measure adopted in the Commission's Part 730 rules, once the Commission completes its review of those rules in Docket 00-0596. (HEPO, Section VII, D, 3, Commission Analysis and Conclusion.) That approach is correct, and it should be extended generally to Section 13-712 and the resulting rulemaking proceeding that has been commenced as Docket 01-0425.

Section 13-712 provides various definitions, limitations and exclusions relevant to the service quality requirements it imposes. The new law provides:

> (6) Credits required by this subsection do not apply if the violation of a service quality standard:
>
> (i) occurs as a result of a negligent or willful act on the part of the customer;
>
> (ii) occurs as a result of a malfunction of customer-owned telephone equipment or inside wiring;
>
> (iii) occurs as a result of, or is extended by, an emergency situation as defined in Commission rules;
>
> (iv) is extended by the carrier's inability to gain access to the customer's premises due to the customer missing an appointment, provided that the violation is not further extended by the carrier;
>
> (v) occurs as a result of a customer request to change the scheduled appointment, provided that the violation is not further extended by the carrier;
>
> (vi) occurs as a result of a carrier's right to refuse service to a customer as provided in Commission rules; or
>
> (vii) occurs as a result of a lack of facilities where a customer requests service at a geographically remote location, a customer requests service in a remote area where the carrier is not currently offering service, or there are insufficient facilities to meet the customer's request for service, subject to a carrier's obligation for reasonable facilities planning.

220 ILCS 5/13-712(e)(6)(i)-(vii). To a large extent, these limitations are already reflected in the Commission's Part 730 rules and the definitions of the Alternative Regulation Plan's service quality measures. However, to eliminate any potential conflicts, the order in this proceeding should expressly adopt the limitations set forth in Section 13-712(e)(6), above, for all measures of service quality under the Plan.

D. THE COMMISSION'S ORDER SHOULD PROVIDE ADEQUATE TIME TO IMPLEMENT ANY NEW CUSTOMER COMPENSATION PROVISIONS.

Finally, if (contrary to Ameritech Illinois' position) the Commission departs from the requirements of Section 13-712 in the Alternative Regulation Plan, the Commission should allow adequate time for implementation of any new requirements. The order should allow all time reasonably necessary for review of the new requirements, system programming, development of methods and procedures, training, and other activities required to successfully complete implementation. Based on Ameritech Illinois' review of the new provisions in Section 13-712, it those activities will require several months of work, from first notice of the new requirements to full implementation. Similar efforts would be required to implement the sort of customer compensation mechanisms that have been advocated by Staff and GCI/City in this proceeding. As a result, if the Commission orders any customer compensation provisions that differ from those promulgated pursuant to Section 13-712, the Commission should permit Ameritech Illinois a minimum of 180 days from the effective date of the order to implement such changes.

II. STRUCTURE OF THE PLAN

As currently structured, the Alternative Regulation Plan contains four service baskets: Residence (network access lines and Bands A and B usage), Business, Carrier and Other (primarily residence vertical features, nonrecurring charges, optional calling plans and miscellaneous services). Order in Dockets 92-0448/93-0239, adopted October 11, 1994 (1994 Order), at pp. 68-69.

At the outset of this proceeding, the Company proposed that all services which remain under the Plan be consolidated into a single basket on a going-forward basis,. As a result of service reclassifications which had already occurred, there was very little left in the Business basket. The majority of carrier services were already strictly priced based on either a federal or state cost standard (i.e., UNEs, wholesale/resale and carrier access services. As a result, there was virtually nothing left in the Carrier basket to which the price index could or should apply. Under these circumstances, continuation of a four-basket structure was no longer appropriate or necessary. Ameritech Illinois also pointed out that restructuring the baskets would provide rate design benefits: it would allow greater flexibility in structuring discounted service packages for customers, and it would permit a meaningful opportunity to restructure rates. (Am. Ill. Ex. 3.0, p. 16; Am. Ill. Ex. 4.0, p. 51). In the alternative, Ameritech Illinois proposed that, at a minimum, all residence services be consolidated in the Residence basket (i.e., that the Residence and Other baskets be combined). (Am. Ill. Init. Br., p. 45).[2]

Staff and GCI urged continuation of the existing basket structure. Staff and GCI contended that continuation of the four baskets was necessary to protect against discrimination between customer groups. (Staff Ex. 13.0, pp. 31-32; GCI Ex. 1.0, pp. 45-46). At least in part, the parties assumed that the business services at issue in Docket 98-0860 would be reclassified as noncompetitive and, therefore, that the Business basket would be repopulated. The Hearing Examiners' Proposed Order recommended continuation of the four-basket structure. (HEPO, Section V, 2, Commission Analysis and Conclusion, par. 1).

This basket consolidation issue should be revisited in light of the amendments to the Public Utilities Act. Under new Section 13-502.5, all business services are now classified as competitive as a matter of law. As a result, there will be no Business basket under the Plan on a going-forward basis. Therefore, the maximum number of baskets will be three: Residence (network access lines and Bands A/B usage), Carrier and Other (residence vertical features, nonrecurring charges, optional calling plans and miscellaneous services).

[2] In Docket 92-0448/93-0369, Ameritech Illinois had originally proposed four baskets. However, residence vertical features and nonrecurring charges were assigned to the Residence basket. 1994 Order, p. 66. This structure was not opposed by any party to the proceeding. The Other basket was expanded by the Commission during its deliberations, primarily to reflect the differences in elasticity between basic and discretionary residential services. These differences led the Commission to impose a five-year rate cap on services in the Residence basket. 1994 Order, at p. 69. The cap has since expired and the Proposed Order does not recommend its reinstatement. Even if it were reinstated, separate baskets are not required to effectuate it. The Commission could simply cap network access lines and Bands A and B usage within an expanded Residence basket.

At a minimum, the Residence and Other baskets should be consolidated. Both baskets contain exclusively residence services. Therefore, the nondiscrimination policy objectives which were advanced in 1994 by creating four separate baskets in 1994 now have far less application. This modest change would at least give the Company more flexibility to adjust rates within the universe of residence services in an economically rational manner.

A more detailed examination of the services contained within the Other basket further supports this result. First, nonrecurring charges should not be assigned to the Other basket at all. Changes in nonrecurring and recurring rates for basic residence service have offsetting impacts on universal service and these interrelationships can be better managed within a single basket. (Am. Ill Ex. 9.0, p. 9; Tr. 2162). In fact, it was never apparent to Ameritech Illinois why nonrecurring charges were assigned to the Other basket in 1994. They are an important component of universal service, because customers cannot obtain service without paying them. The Link-up subsidy program, which offsets 50% of installation charges up to a maximum of $30, constitutes governmental recognition of the essential nature of these charges. They are not "discretionary" in the way that vertical services and optional calling plans are discretionary and they never logically belonged in the "Other " basket in the first place.

Second, maintaining the enforced separation between basic residence services and discretionary services like vertical features will become increasingly unworkable as Ameritech Illinois implements the new service packages required by Section 13-518 of the Act. Under Section 13-518, the Company must offer customers optional service packages which contain a network access line, flat-rated local usage and, with respect to certain packages, vertical features. If one assumes that these mandated service options are assigned to the Residence basket, as Staff has recommended, then vertical features will be found in both the Residence and Other basket.

(Staff Init. Br. on Exc., pp. 36-37). The basket assignment will not depend on any logical division between types of features (and/or their relative elasticities), but simply on whether consumers have subscribed to them as part of a package or on an à la carte basis. There is no policy logic supporting continued separation under these circumstances.

As a further clarification of Ameritech Illinois' position, the Company does not oppose Staff's view that the mandated packages should be assigned to the Residence basket. Introducing these packages will essentially restructure Ameritech Illinois' residence rates. Therefore, it would be reasonable from a policy perspective to treat these offerings differently from optional calling plans like SimpliFive and CallPak, which were properly assigned to the Other basket.

Third, consolidating the Residence and Other baskets will also address Staff's concern about the treatment of these optional calling plans. Staff has taken the position that the SimpliFive and CallPak plans should have been assigned to the Residence basket, not the Other basket. (Staff Ex. 13.0, pp. 24-26). Ameritech Illinois has consistently disagreed. These calling plans are optional and were properly assigned to the Other basket, along with all other optional services. The Hearing Examiners' Proposed Order validated Ameritech Illinois' approach under a multi-basket structure. However, consolidating the Residence and Other baskets as the Company is recommending will eliminate Staff's concern, moot this issue and eliminate future disputes over the proper assignment of new calling plans.[3]

Finally, consolidation of these two baskets is necessary because much of the Company's ability to reduce rates in the Residence basket has been exhausted over the last six years. A

[3] It is important to recognize, however, that such plans would constitute "new" services for purposes of application of the price index, regardless of what basket they are assigned to. Otherwise, as GCI has argued previously, the Company would have been prohibited from offering SimpliFive and CallPaks at all. (CUB Init. Br., p. 68).

small number of services are currently assigned to the Residence basket (network access lines and Bands A and B usage). Residence network access line rates are too low today and further reductions would be inappropriate. Significant reductions have already been made to the usage services which generate contribution. However, there are imputation (Band B) and LRSIC (Band A) floors which constrain the Company's ability to implement required price changes in these services indefinitely. Thus, future annual price cap reductions are becoming problematical. (Am. Ill. Ex. 3.3, p. 4).

Thus, there are policy justifications -- from either Ameritech Illinois' perspective or Staff's -- to include nonrecurring charges, vertical features and optional calling plans in the Residence basket. These service categories comprise over 90% of what is today contained in the Other basket. Under these circumstances, the Residence and Other baskets should be consolidated on a going-forward basis. [4]

Under this approach to residence services, only the Carrier basket would remain as a separate and second basket. For the reasons stated in Ameritech Illinois' Brief on Exceptions, the Hearing Examiners' Proposed Order seriously erred in concluding that UNEs, wholesale (resale) services and carrier access charges should be subject to the price index. (Am. Ill. Br. on Exc., pp. 21-27). Assuming that the Commission reverses those conclusions, then there is virtually nothing left in the Carrier basket and it makes no sense to continue its separate existence. Even if carrier access, UNEs and wholesale services are subject to the index, they only represent 16% of the total noncompetitive revenues subject to the Plan (see Attachment A). Staff was not opposed initially to eliminating this basket and consolidating it with the Other

[4] Attachment A provides a current breakdown of the revenues in the three remaining baskets (i.e., Residence, Carrier and Other), based on the Company's 2001 Annual Price Cap filing and a further breakdown of the major components of the Other basket.

basket. (Staff Ex. 13.0, p. 37). Assuming that the Residence and Other baskets are combined, carrier services should simply be merged into the one remaining basket.

III. RATE REBALANCING

In this proceeding, Ameritech Illinois proposed to rebalance rates by increasing the monthly charges for residence network access lines by $2 per month across all access areas, while reducing other service rates to make the plan revenue neutral. As discussed in the Company's Brief on Exceptions, however, Ameritech Illinois has withdrawn its rate rebalancing proposal in light of Section 13-518 of H.B. 2900. (Am. Ill. Br. on Exc., p. 41). That Section requires Ameritech Illinois to offer three flat rate local service packages to residential customers: (i) a "budget" package, consisting of one access line and unlimited local calls; (ii) a "flat rate package," consisting of one access line, unlimited local calls and the customer's choice of two vertical features; and (iii) an "enhanced flat rate package," consisting of two access lines, unlimited local calls, the customer's choice of two vertical features and unlimited local toll service. The Company is in the process of developing and filing rate packages designed to meet the requirements of Section 13-518. At this time, however, it is uncertain what impact these flat rate packages will have on the Company's rate structure in general, and the rate rebalancing proposal in particular. Until it has had an opportunity to fully assess that impact, the Company determined that it would be prudent to withdraw its rate re-balancing proposal.[5]

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[5] In its Reply Brief on Exceptions (pp. 15-16), GCI/City argued that "Ameritech's attempt at unilateral withdrawal of the rate rebalancing petition be denied" because the Company did not file a "stipulation" or "motion" pursuant to Section 5/2-1009 of the Illinois Code of Civil Procedure. As GCI/City acknowledged, however, that Section does not apply to Commission proceedings. The Company's decision to withdraw the rate rebalancing proposal was based on an unforeseen change in circumstances (the enactment of Section 13-518) which occurred after the conclusion of the evidentiary hearings and issuance of the Proposed Order. GCI/City has identified no valid legal or policy basis for precluding a party to a Commission proceeding from withdrawing a proposal in such a situation.

The Proposed Order rejected the Company's rate rebalancing proposal. (HEPO, Section IV, Commission Analysis and Conclusion). As the sole basis for this decision, the Proposed Order took issue with the Loop Facility Analysis Model ("LFAM"), used by the Company to develop investments for the feeder, distribution and drop portions of the local loop for purposes of calculating network access line LRSICs. For reasons fully discussed in Ameritech Illinois' Brief on Exceptions, the Proposed Order's statements critical of the LFAM are unsupported by adequate findings and are contrary to the evidence. (Am. Ill. Br. on Exc., pp. 41-65). Moreover, the Proposed Order's disposition of the cost of service issues leaves the Company without an approved cost study methodology which can be used in future proceedings.

Because the Company is withdrawing its rate rebalancing proposal at this time to assess the potential impact of Section 13-518, there is no need for the Commission to rule on that proposal or to resolve the contested cost of service issues; nor is there any reasons to resolve the other non-cost, policy-related issues raised by the parties regarding rate rebalancing. To avoid duplicate litigation in future proceedings and the potential for stalemates over rate design issues, however, Ameritech Illinois urges the Commission to either approve its cost of service models based on the record or, at a minimum, to direct the Company and Staff to work together now to resolve the issues.

# # # # #

CONCLUSION

In view of the foregoing, the Alternative Regulation Plan should be modified consistent with Ameritech Illinois' recommendations regarding the impact of the new amendments to the Public Utilities Act.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Louise A. Sunderland, an attorney, hereby certify that copies of the foregoing Initial Brief of Ameritech Illinois on Impact of New Legislation were served upon the parties on the attached service list via electronic mail and/or by U.S. Mail on July 23, 2001.

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